

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

United States of America

v.

Martin S. Gottesfeld
Defendant, pro se

Case No.: 16-cr-10305

FILED
Clerk's Office
USDC, Mass.
Date JAN 07 2019
By Deputy Clerk

MOTION TO VACATE

Defendant Martin S. Gottesfeld (herein "Defendant"), acting pro se over his continuing objection, hereby moves The Honorable District Court to vacate its previously-issued prior restraints, including but not limited to the order issued as part of D.E. 129 (prohibiting the defendant from contacting the government), D.E. 210 (ordering non-party non-witnesses from contacting unnamed other non-party non-witnesses) and to clarify which prior restraints, if any, remain in effect.

The majority of these prior restraints, including the two explicitly cited supra, were entered with no meaningful opportunity to bring objections beforehand. This violated Due Process and was unconstitutional.

The order found in the Docket text of D.E. 129 trespasses on the defendant's 1st Amendment rights to free speech, to petition the government for the redress of grievances, and as a journalist to gather and report the news (please see Exhibit A attached hereto).

Motion denied. JMG, USDC 1/7/19